

EXHIBIT “A”

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
4 PHILADELPHIA COUNTY
5 CASE NO. 19-04078-RBS

6 -----x
7 EVELYN CINTRON,

8 Plaintiff,

9 v.

10 CITY OF PHILADELPHIA, et al,

11 Defendants.
12 -----x

13 1717 Arch Street

14 Philadelphia, Pennsylvania

15 October 28, 2022

16 11:03 a.m.

17 VIDEOTAPED DEPOSITION of EVELYN
18 CINTRON, the Plaintiff, held at the
19 above-entitled time and place, taken before
20 Carolyn Crescio, a Professional Shorthand
21 Reporter and Notary Public of the State of
22 Pennsylvania.

23 * * *

1 E. CINTRON

2 And they did this behind my back because
3 neither sergeants informed me that they were
4 going to do that, because if they had informed
5 me, I would have -- it was a standing order on
6 my part that the center was to remain closed.
7 And they went behind my back because Ted told
8 them to open it and not to listen to me.

9 Q. So are Faust and Irving the two
10 sergeants in the PAL unit?

11 A. Yes.

12 Q. And who is it that told you Ted told
13 them to do this?

14 A. Both sergeants. Ted Qualli was
15 called to come to the center again. This time
16 when he showed up at the center, he confirmed
17 what the sergeant said. He told me, Lieutenant,
18 like I told you, you are not -- I spoke to the
19 board, and you're not allowed to shut down the
20 center. We would lose a lot of funding if they
21 know that this is not a viable center.

22 And I stated to him that money, the money
23 that they get for the center was not more
24 important than the safety of the kids.

25 And I later found out that they were

1 E. CINTRON

2 Q. If you were aware of the meetings,
3 were you told that you were not invited?

4 A. They told me that I would be getting
5 an Outlook invite every month, which I never
6 did. And when I asked why I wasn't attending
7 these meetings, Ted said they only wanted --

8 (Court reporter clarification.)

9 A. Ted Qualli stated that they only
10 wanted to meet with him.

11 Q. And so when you say -- who do you --
12 who are you referring to by "they"?

13 A. When I would ask him why I was being
14 excluded from the decision-making meetings that
15 they held monthly with Bernie Prazenica and Ron
16 Rabena, he told me they only wanted to meet with
17 him.

18 Q. As the executive director for PAL?

19 A. Yes.

20 Q. And was it meetings with the board
21 or meetings with only Ron and Prazenica?

22 A. It was both. Sometimes they would
23 meet with the board, but the monthly meeting was
24 just with Ron Rabena. I don't know who else
25 would attend because I wasn't there, but the

1 E. CINTRON

2 Q. So this was a general meeting, you
3 said?

4 A. Yes.

5 Q. And when did that occur?

6 A. 2016.

7 Q. Was this the only meeting you
8 attended?

9 A. No, I would go to the general
10 meetings. The meetings I wasn't invited to were
11 the decision-making meetings.

12 Q. So is it your testimony that no
13 decisions were made during general meetings?

14 A. No. That was just the reporting
15 from the different committees, the different
16 committees reporting out.

17 Q. So I guess what I'm trying to find
18 out is if no decisions were being made during
19 the general meetings, why are Ted, Bernie, and
20 Ron going, like, to have a sidebar?

21 A. That's something you have to ask
22 them.

23 Q. So you don't know what they were
24 deciding?

25 A. Well, no, they were talking about

1 E. CINTRON

2 the topics that would come up or that I would
3 bring up.

4 Q. And -- but you don't know what they
5 discussed during those sidebars?

6 A. No.

7 Q. I want to again ask -- the exclusion
8 from the meetings, how do you know you were
9 excluded from the meetings based on your
10 national origin?

11 A. I was a female commander in an
12 important unit like PAL, and I was being
13 excluded from attending the meetings that had to
14 do with making decisions under my authority as
15 commanding officer. Yet all of the males that
16 were also involved making decisions would be at
17 these meetings. So it's -- it was -- you know,
18 it was vividly known that it was me who they
19 didn't want in the meeting.

20 Q. So what I want to know is, they
21 didn't want you in the meeting, how do you know
22 that had to do with your national origin?

23 A. I'm the top female commander at PAL
24 responsible for making decisions, responsible
25 for the officers, responsible for the kids,

1 E. CINTRON

2 is what they were doing.

3 Q. So would they let a male Latino make
4 that --

5 A. I don't know what they would do, but
6 I know that the previous commander was white,
7 and they didn't exclude him from the meetings.

8 Q. How do you know that?

9 A. Because they told me that Lieutenant
10 Eddis would attend the meetings.

11 (Court reporter clarification.)

12 A. Eddis.

13 Q. E-D-D-I-S.

14 And so when you say "they," you're
15 referring to Ron, Bernie, and Ted?

16 A. Yes, when they told me that I would
17 be attending the same meeting as well, but then
18 was not invited to attend. I was definitely
19 treated different than my male counterparts in
20 the unit.

21 Q. Well, so let me ask a more specific
22 question because then maybe I can focus what I'm
23 asking next.

24 You're saying that you felt treated
25 differently as a female. And because, for

1 E. CINTRON

2 example, it was all men in those meetings. What
3 I'm asking you is, is there anything
4 specifically, not including being a female, are
5 there any instances where you felt Bernie
6 treated you differently because you're a Latina?
7 Excluding your gender. Leave that aside for the
8 moment.

9 A. I just explained that to you.
10 You're treating me differently when you won't do
11 this to a male commander. You're treating me
12 differently when, as the female commander of the
13 unit, you're excluding me from meetings that I
14 should be attending to make decisions.

15 Q. Do you know how long Officer Eddis
16 was the commanding officer for PAL?

17 A. No.

18 Q. And do you know who's the commanding
19 officer before Eddis?

20 A. No, I don't recall.

21 Q. So how do you know that Commanding
22 Officer Eddis wasn't excluded from any of the
23 meetings?

24 A. I don't know if he was excluded from
25 any of the meetings, but according to Ted, he

1 E. CINTRON

2 attended the monthly meetings with Eddis when
3 Eddis was there.

4 Q. So your understanding of his
5 attendance is from Ted?

6 A. And Bernie Prazenica and Ron, when
7 they told me that -- when I came to PAL, that I
8 would attend the same meetings, and it's
9 attended with Ted on a monthly basis to talk
10 about the problems and where they would make the
11 decisions for PAL. So I was told that I would
12 be invited, just like Lieutenant Eddis would be
13 invited -- was attending those meetings, but I
14 wasn't.

15 Q. Just so I'm clear, you have no
16 personal knowledge from Commanding Officer
17 Eddis, what meetings he attended or did not; is
18 that correct?

19 A. My knowledge came from Bernie
20 Prazenica and Ron Rabena.

21 Q. Apart from being excluded from the
22 meetings, and Bernie not shaking your hand, what
23 other incidents can you identify where you felt
24 you were treated differently because of being
25 Latina or a female, by PAL?

1 E. CINTRON

2 she was relaying from Bernie and Ron Rabena.

3 Q. Did Bernie ever tell you that they
4 sent Maureen Rush to deliver that message to
5 you?

6 A. No. She told me. She confirmed it.

7 Q. Did Ron or Ted ever tell you that
8 they sent her to deliver the message?

9 A. No. But Ted was the one that
10 delivered the message under false pretense that
11 I was meeting with her for programs.

12 (Email is received and marked as
13 Exhibit PAL-5 for identification, as
14 of this date.)

15 Q. This, Ms. Cintron, if you -- this
16 was produced separately, but I believe it's
17 related to PAL-3, looks to be -- they have the
18 same subject matter and time frame.

19 A. Yes.

20 Q. And in PAL-3, it says: Does the
21 time on 10/24 work for you? This was a date
22 proposed by Ms. Faust. And in PAL-5, Ted
23 responds to you -- PAL-5 is the one I just gave
24 you.

25 A. This one?